

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HAYMOUNT URGENT CARE PC and
ROBERT A. CLINTON, JR., *individually and
on behalf of all those similarly situated,*

Plaintiffs,

v.

GOFUND ADVANCE, LLC, FUNDING 123,
LLC, MERCHANT CAPITAL LLC, ALPHA
RECOVERY PARTNERS, LLC, YITZCHOK
("ISAAC") WOLF, JOSEF BREZEL, JOSEPH
KROEN, AND YISROEL C. GETTER,

Defendants.

Case No. 1:22-cv-01245-JSR

**DECLARATION OF SHANE R. HESKIN IN SUPPORT
OF PLAINTIFFS' MOTION TO AMEND THE AMENDED COMPLAINT**

SHANE R. HESKIN, pursuant to 28 U.S.C. § 1746, declares under penalties of perjury that the foregoing is true and correct:

1. I am a Partner of White and Williams LLP, attorneys for Plaintiffs Haymount Urgent Care PC ("Haymount") and Robert A. Clinton, Jr. ("Dr. Clinton"). I make this Declaration in support of Plaintiffs' Motion to Amend the Amended Complaint [DE 209]. Unless otherwise noted, I am personally familiar with the facts set forth herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiffs' Proposed Second Amended Complaint. Exhibits referenced therein are the same as those filed with the Amended Complaint and are located at [DE 28-1 to 28-11].

3. Attached hereto as **Exhibit B** is a true and correct copy of a redline comparison of Plaintiffs' Proposed Second Amended Complaint and Plaintiffs' Amended Complaint [DE 28].

Dated: March 22, 2023

WHITE AND WILLIAMS LLP

By: 

Shane R. Heskin

7 Times Square, STE 29

New York, NY 10036

(215) 864-6329

heskins@whiteandwilliams.com